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April 25, 2023

Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Jane Doe v. Telemundo Network Group LLC, et al.*, 22 Civ. 7665 (JPC)(KHP)

Dear Judge Cronan:

We are counsel to Defendant Rafael Ortega (“Ortega”) in the above-referenced action. As the Court is aware, two motions are currently pending before the Court: Defendants’ omnibus motion to dismiss (*see* ECF Nos. 37-41), and Plaintiff’s motion to proceed pseudonymously (“Plaintiff’s Motion”) (*see* ECF Nos. 44-45). We write with respect to the latter to request, pursuant to Rule 4(B)(ii) of Your Honor’s Individual Rules and Practices, that Ortega – who opposed Plaintiff’s Motion – be permitted to file: (1) a redacted version of a supplemental letter seeking to provide the Court with newly published evidence which further supports the denial of Plaintiff’s Motion; and (2) a redacted version of a related exhibit. The scope of the proposed redactions is narrow, limited only to: (1) references to Plaintiff’s identity; (2) URL links or exhibit descriptions; and/or (3) the aforementioned exhibit, all of which will make public, or tend to reveal, Plaintiff’s identity.

Pursuant to Rule 4(B)(ii) of Your Honor’s Individual Rules and Practices, undersigned counsel contacted Plaintiff’s counsel who confirmed that Plaintiff consents to the within request and would prefer the above-referenced redactions be made to Ortega’s anticipated filings.

We thank the Court for its time and consideration of the matters within.

Respectfully submitted,

/s/

Richard Weingarten

Cc: All counsel (**via ECF**)